



FEDERAL ELECTION COMMISSION

Washington, DC 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel **MC**

DATE: January 7, 2000

SUBJECT: MUR 4806- General Counsel's Report.

The attached is submitted as an Agenda document for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

DISTRIBUTION

SENSITIVE

☒

NON-SENSITIVE

☐

72 Hour TALLY VOTE ☐

24 Hour TALLY VOTE ☐

24 Hour NO OBJECTION ☐

INFORMATION ☐

96 hour Tally Vote ☒

COMPLIANCE

☒

Open/Closed Letters ☐

MUR ☐

DSP ☐

STATUS SHEETS ☐

Enforcement ☐

Litigation ☐

PFESP ☐

RATING SHEETS ☐

AUDIT MATTERS ☐

LITIGATION ☐

ADVISORY OPINIONS ☐

REGULATIONS ☐

OTHER ☐

JAN - 7 2000 RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

BEFORE THE FEDERAL ELECTION COMMISSION 2000 JAN - 7 P 4 19

In the Matter of)
) MUR 4806
DNC Services Corporation/Democratic)
National Committee and Andrew Tobias,)
as treasurer)
Hamilton Bank, N.A.)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. ACTIONS RECOMMENDED

Accept the attached proposed conciliation agreements from Hamilton Bank, N.A. ("the Bank") and DNC Services Corporation/Democratic National Committee and Andrew Tobias, as treasurer ("DNC"), and close the entire file.

II. BACKGROUND

This matter concerns violations of 2 U.S.C. § 441b(a) arising from the Bank, a national bank, making, and the DNC accepting and depositing into its non-federal account, a contribution totaling \$50,000. See First General Counsel's Report dated August 14, 1998. Upon the completion of this Office's investigation into this matter, on October 19, 1999, the Federal Election Commission ("the Commission") determined to enter into preprobable cause conciliation with the DNC and the Bank in resolution of this matter.¹

¹ On that same date, the Commission determined to take no action against Howard M. Glicker, and to take no further action against Eduardo A. Masferrer and Maria F. Diaz, and closed the file in regard to them.

IV. RECOMMENDATIONS


1. Accept the attached conciliation agreement with Hamilton Bank, N.A.
2. Accept the attached conciliation agreement with DNC Services Corporation/Democratic National Committee and Andrew Tobias, as treasurer.
3. Close the file.
4. Approve the appropriate letters.

Lawrence M. Noble
General Counsel

Date

1/7/00

BY:


Lois G. Lerner
Associate General Counsel